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6 Attorneys for Defendant Strategic Behavioral Health LLC  
Montevista Hospital, Inc.  
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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 RENAE SIMMS,

11 Plaintiff,

12 vs.

13 STRATEGIC BEHAVIORAL HEALTH, LLC,  
a Delaware corporation, BHC MONTEVISTA  
14 HOSPITAL, INC., incorrectly named as  
MONTEVISTA HOSPITAL, a Delaware  
15 corporation, DOES I through X, inclusive, and,  
ROE CORPORATIONS I through X, inclusive,

16 Defendants.  
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Case No.: 2:19-cv-01998-JCM-VCF

**STIPULATION EXTENDING TIME FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

18 IT IS HEREBY STIPULATED by and between Plaintiff RENAE SIMMS ("Plaintiff"),  
19 through her counsel, HOLMAN LAW OFFICE, and Defendant, STRATEGIC BEHAVIORAL  
20 HEALTH LLC ("SBH"), by and through its counsel, Jackson Lewis P.C., that Defendant shall  
have an extension up to and including June 8, 2020, in which to file its response to Plaintiff's  
22 First Amended Complaint. This Stipulation is submitted and based upon the following:

23 1. Plaintiff filed her First Amended Complaint on January 1, 2020. ECF No. 7.  
24 Defendants accepted served for the First Amended Complaint on April 1, 2020. ECF No. 7 and  
25 ECF No. 8.

26 2. Defendant's response to the Complaint is currently due on June 1, 2020.  
27 3. Due to the press of other matters, including adjustments made necessary by the  
28 COVID-19 pandemic, and in order to fully respond to the pleading, Defendants require additional

1 time to respond to the Complaint. Defendants accordingly request an extension, up to and  
2 including June 8, 2020, to file its responsive pleading.

3 4. This is the first request for an extension of time for Defendants to file a response to  
4 Plaintiff's First Amended Complaint.

5 5. This request is made in good faith and not for the purpose of delay.

6 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as  
7 waiving any claim and/or defense held by any party.

8 Dated this 1<sup>st</sup> day of June, 2020.

9 HOLMAN LAW OFFICE

JACKSON LEWIS P.C.

10 \_\_\_\_\_  
11 /s/ *Kristina S. Holman*  
Kristina S. Holman  
12 3470 E. Russell Road, Suite 202  
Las Vegas, NV 89120

13 Attorneys for Plaintiff

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11 /s/ *Lisa A. McClane*  
Lisa A. McClane, Bar No. 10139  
12 300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101

13 Attorneys for Defendant

15 ORDER

16 IT IS SO ORDERED



17 \_\_\_\_\_  
18 United States Magistrate Judge

19 Dated: 6-2-2020

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22 4848-6054-6238, v. 1

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